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January 31, 2012

Dr. Jim Roelofs  
Office of Pesticide Programs  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460-0001

RE: Issue Paper: "Non-Cropland" as a Use Site

Dear Dr. Roelofs:

Syngenta Crop Protection, LLC (Syngenta) appreciates the opportunity to comment on the issue paper addressing "Non-Cropland" as a Use Site.

EPA should allow the use of "non-crop" terms only in combination with information on specific use sites. In addition, some of the terms currently considered "non-crop" sites should be separated from that designation into other groups (e.g. public gathering places). Realizing that there is a considerable list of specific use sites, it would also be beneficial to establish some phrases that encompass multiple sites, where possible.

Therefore, we propose that EPA re-evaluate "non-crop" sites, establish additional groups where necessary, and propose phrases and other guidance for registrants utilizing these groups, specific sites, and clarifying language on labels. Once new groups are established, Agency decisions can be made concerning data requirements and label changes.

In the interest of label improvements important for risk assessors, pesticide users, educators, and enforcement agencies, we respectfully submit these comments for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Carol N. Somody". The signature is written in a cursive, flowing style.

Carol N. Somody, Ph.D.  
Senior Stewardship Manager  
Regulatory and Stewardship  
Syngenta Crop Protection, LLC